IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

BISOUS BISOUS LLC,

Plaintiff.

v.

Case No. 3:21 CV01614-B

THE CLE GROUP, LLC, BISOU UPTOWN MANAGER, LLC, and JOHN DOES 1–10,

Defendants.

JOINT MOTION FOR EXTENSION OF TIME

Plaintiff Bisous Bisous LLC ("Plaintiff") and Defendants The Cle Group, LLC and Bisou Uptown Manager, LLC ("Defendants") (collectively, the "Parties") jointly move for an extension of time to meet and confer pursuant to Rule 26(f) and to submit a joint status report and respectfully show the Court as follows:

- On July 29, 2021, Plaintiff filed its First Amended Complaint for Willful Trademark Infringement and Unfair Competition (Dkt. 26) against Defendants.
- 2. On August 20, 2021, the Court issued a Status Report Order (Dkt. 48) (the "Order") in this case. Pursuant to the Status Report Order, the Parties are directed to submit a Joint Status Report no later than September 10, 2021. The Status Report Order also requires that the Parties meet and confer in person regarding the matters specified in Fed. Rule Civ. P. 26(f) and in the Order (the "Rule 26(f) conference") no later than seven (7) calendar days before the Joint Status Report due date, on September 3, 2021.

- 3. Due to immovable scheduling and travel conflicts for counsel for both Plaintiff and Defendants, the Parties seek an extension on their deadline to submit a Joint Status Report by four (4) calendar days, up to and including September 14, 2021. The Parties additionally seek an extension on their deadline to conduct the Rule 26(f) Conference by four (4) calendar days, up to and including September 7, 2021.
- 4. The requested extensions will not affect any other deadlines set in the Status Report Order.

Relief Requested

The Parties respectfully seek an extension of time for the deadlines set forth above. The requested extensions are agreed upon by Plaintiff and Defendants.

Respectfully submitted,

FISH & RICHARDSON P.C.

Dated: August 25, 2021 By: /s/ David B. Conrad

David B. Conrad Texas Bar No. 24049042 conrad@fr.com 1717 Main Street, Suite 5000 Dallas, TX 75201

Telephone: (214) 747-5070 Facsimile: (214) 747-2091

Kristen McCallion (*pro hac vice*) mccallion@fr.com
Vivian Cheng (*pro hac vice*) cheng@fr.com
7 Times Square, 20th Floor
New York, NY 10036
Telephone: (212) 765-5070

Telephone: (212) 765-5070 Facsimile: (212) 258-2291

Attorneys for Plaintiff

AGREED:

BUETHER JOE & COUNSELORS, LLC

By: /s/ Kenneth P. Kula

Kenneth P. Kula

Texas Bar No. 24004749

Ken.Kula@BJCIPLaw.com

Eric W. Buether

Texas Bar No. 03316880

Eric.Buether@BJCIPLaw.com

Christopher M. Joe

Texas Bar No.: 00787770 Chris.Joe@BJCIPLaw.com

1700 Pacific Avenue

Suite 4750

Dallas, Texas 75201

Telephone: (214) 730-5660 Facsimile: (972) 707-1248

Attorneys for Defendants

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5.1(d) on August 25, 2021, and it was served via CM/ECF on all counsel who are deemed to have consented to electronic service.

/s/ David B. Conrad
David B. Conrad